

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

INTELLECTUAL VENTURES I LLC and	)	
INTELLECTUAL VENTURES II LLC,	)	
	)	
<i>Plaintiffs,</i>	)	<b>C.A. No. 4:24-cv-00980-ALM</b>
	)	
v.	)	
	)	<b>JURY TRIAL DEMANDED</b>
AMERICAN AIRLINES, INC.	)	
	)	
<i>Defendant.</i>	)	

**JOINT CLAIM CONSTRUCTION STATEMENT**

Pursuant to the Court’s Scheduling Order (Dkt. 44), Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC (collectively, “Plaintiffs” or “IV”) and Defendant American Airlines, Inc. (“American”) (collectively, “Parties”) hereby provide the following Joint Claim Construction Statement for the terms, phrases, and clauses appearing in the asserted claims of U.S. Patent Nos. 7,949,785 (“the ’785 Patent”), 8,332,844 (“the ’844 Patent”), 8,407,722 (“the ’722 Patent”), 7,257,582 (“the ’582 Patent”), 7,324,469 (“the ’469 Patent”), and 8,027,326 (“the ’326 Patent”) (collectively, the “Asserted Patents” or “Patents-in-Suit”).<sup>1</sup>

**I. LIST OF AGREED CONSTRUCTIONS**

The Parties currently do not agree on any constructions.

**II. LIST OF DISPUTED TERMS FOR CONSTRUCTION**

The Parties’ list of disputed terms for construction is shown below. IV’s proposed claim construction and identification of intrinsic record and extrinsic evidence for these terms is provided

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<sup>1</sup> IV contends that the Asserted Patents include U.S. Patent Nos. 7,721,282, 7,822,841, 8,352,584, 10,103,845, 7,712,080, and 11,032,000. American disagrees as the Court has not yet ruled on IV’s Motion for Leave (Dkt. 48), so the Asserted Patents are limited to those identified in the operative, original complaint (Dkt. 1).

in Exhibit A. American's proposed claim construction and identification of intrinsic record and extrinsic evidence for these terms is provided in Exhibit B.

**1. U.S. Patent No. 7,949,785**

- network address (claims 30 and 37)
- network route director (claim 30)

**2. U.S. Patent No. 8,332,844**

- root image (claims 7 and 11)

**3. U.S. Patent No. 7,257,582**

- partition (claim 1)
- descriptions of all of said partitions (claim 1)
- on a first-come/first-served basis (claim 1)
- simultaneously executing at least a respective one of the subtasks of the computer-executable process in each of at least some of said processors on a respective one of the partitions (claim 1)

**4. U.S. Patent No. 8,407,722**

- input source (claim 14)
- identify a category of the update message based on the input source (claim 14)

**5. U.S. Patent No. 7,324,469**

- a remote location (claim 24)
- a relatively high volume of transient traffic (claim 24)

**III. ANTICIPATED LENGTH OF TIME FOR CLAIM CONSTRUCTION HEARING**

IV anticipates that 2 hours are necessary for the Claim Construction Hearing. American anticipates that 4 hours are necessary for the Claim Construction Hearing.

**IV. WITNESS FOR THE CLAIM CONSTRUCTION HEARING**

The Parties do not anticipate calling any witnesses at the claim construction hearing at this time.

**V. OTHER ISSUES FOR A PREHEARING CONFERENCE**

The Parties do not anticipate addressing any other issues at a prehearing conference at this time.

**VI. ESTIMATED NUMBER OF PAGES FOR CLAIM CONSTRUCTION BRIEFS**

The Parties' estimate that the following number of pages should be allocated to each respective brief: 30 pages for IV's opening brief, 30 pages for American's responsive brief, and 10 pages for IV's reply brief.

Dated: August 4, 2025

RESPECTFULLY SUBMITTED,

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**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing document was served or delivered electronically to all counsel on August 4, 2025, via the Court's CM/ECF system.

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